

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: October 31, 1997

ANALYST: Edward D. Ryan

- I. COMMITTEE: Association of Trial Lawyers of America
Political Action Committee (C00024521)
Dan Cohen, Treasurer
(September 4, 1997 to Present)
Carmen Belefonte, Treasurer
(August 11, 1996 to September 3, 1997)
Matthew D. Smyth, Treasurer
(January 3, 1995 to August 10, 1996)
1050 31st Street NW
Washington, DC 20007
- II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(2)(c)
11 CFR §110.3(b)(3)(i) and (ii)

III. BACKGROUND:

Contributions to State and County Party Committees in Excess of the Limitations

The 1996 October Monthly Report filed by the Association of Trial Lawyers of America Political Action Committee ("the Committee") disclosed contributions to the federal accounts of the Texas Democratic Party (C00099267) and 21st Century Political Action Committee (C00274001)¹ of \$5,000 each on September 30, 1996 (Attachment 2).

The 1996 12 Day Pre-General Report disclosed contributions to the federal accounts of Bexar County Democratic Party (C00270868), Dallas County Democratic Party (C00248864), Galveston County Democratic Party

¹ This is the name of record for the Federal Account of the Tarrant County Democratic Party.

(C00274019), Harris County Democratic Party (C00161067), Jefferson County Democratic Party (C00253880) and Travis County Democratic Party (C00257519) of \$5,000 per committee on October 1, 1996, bringing the total of apparent excessive contributions to the Texas State and County Democratic Party committees to \$35,000 (Attachment 3).

On May 21, 1997, Requests for Additional Information ("RFAs") were sent to the Committee for the 1996 October [REDACTED] Pre-General Reports. The RFAs notified the Committee that [REDACTED] 11 CFR § 110.3(a) precluded a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year. The RFAs advised the Committee that if the contributions were incompletely or incorrectly disclosed, amendments to the original reports should be submitted with clarifying information. In addition, the Committee was advised that if these were excessive contributions, it should notify the recipients and request refunds of the amount in excess of \$5,000. The Committee also was to inform the Commission of its corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committees (Attachment 4).

On June 5, 1997 the Committee responded to the RFAs in a letter from Heather Tureen (FKA Heather Weaver), Assistant Treasurer and Director of the Committee. Ms. Tureen stated that the Committee's understanding of 11 CFR § 110.3(b) required local party committees to share the same contribution limit with their state party committee, unless they demonstrate their independence. She went on to state that it was its understanding that the Texas County Democratic Party committees had demonstrated their independence from the Texas State Democratic Party and were therefore subject to separate contribution limits. According to Ms. Tureen, prior to making the contributions, it was represented to them that the County Party committees were independently run, controlled, and financed. She said if the County Party committees were in fact affiliated, the Committee would promptly take any and all necessary remedial action (Attachment 5).

On June 12, 1997 a Second Notice was sent to the Committee for not providing all requested information.² The Notice advised the Committee that local party committees within a state and the state party committee are presumed to be affiliated with each other and share one contribution limit as one political committee. If a local party committee wished to be considered independent of the state party committee it must meet certain standards under 11 CFR § 110.3(b)(3)(i)

²

The Notice incorrectly referred to the October Quarterly rather than October Monthly Report.

and (ii) and submit an Advisory Opinion Request to the Commission. The Committee was further advised that the recipient committees should be notified and refunds requested of the amounts in excess of \$5,000 (Attachment 6).

In a letter dated June 23, 1997 Ms. Tureen responded to the Second Notice by summarizing its position concerning the contributions made to the Texas State and County Party committees. Ms. Tureen said that upon receipt of the Notice, letters were sent to the local County Party committees requesting refunds of the Committee's contributions (copies of the letters were attached to its response). Ms. Tureen said that once the Committee receives refunds from the County Party committees, it would submit amendments for the 1996 October Monthly and 12 Day Pre-General Reports reflecting these refunds (Attachment 7).

On July 1, 1997 the Reports Analysis Division ("RAD") analyst called Ms. Tureen to advise her that any refunds received should be included in the report covering the period in which they are received and not on amendments to the original reports (Attachment 8).

In a letter dated July 1, 1997 Ms. Tureen amended her June 23, 1997 letter by stating the Committee will disclose any refunds from the local county party committees on the report covering the period that they are received (Attachment 9).

As of the date of this referral, the Committee has not disclosed the receipt of any refunds from any of the Texas Democratic State and County Party committees.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES PAGES TYPE OF FILER	MICROFILM LOCATION
-----------	----------	----------	---------------	--	-----------------------

ASSOCIATION OF TRIAL LAWYERS OF AMERICA POLITICAL ACTION COMMITTEE
CONNECTED ORGANIZATION: LAWYERS OF AMERICA; ASS'N OF TRIAL

ID #C00024521 NON-PARTY QUALIFIED

1995 STATEMENT OF ORGANIZATION - AMENDMENT			9JAN95	2	95FEC/955/3283
STATEMENT OF ORGANIZATION - AMENDMENT			9JAN95	2	95FEC/955/5081
FILING FREQUENCY CHANGE NOTICE			6FEB95	2	95FEC/965/2033
ACKNOWLEDGEMENT OF FILING FREQUENCY CHANGE			24FEB95	2	95FEC/967/2961
MISCELLANEOUS REPORT TO FEC			17MAR95	3	95FEC/970/0767
MISCELLANEOUS REPORT TO FEC			17MAR95	3	95FEC/970/0770
MISCELLANEOUS REPORT TO FEC			17MAR95	3	95FEC/970/0773
MISCELLANEOUS REPORT TO FEC			17MAR95	3	95FEC/970/0776
MISCELLANEOUS REPORT TO FEC			20NOV95	3	95FEC/000/3505
MID-YEAR REPORT	1,068,271	930,905	1JAN95 -30JUN95	368	95FEC/990/0428
MID-YEAR REPORT - AMENDMENT	-	-	1JAN95 -30JUN95	3	95FEC/996/3990
MID-YEAR REPORT - AMENDMENT	1,068,271	930,905	1JAN95 -30JUN95	10	95FEC/006/3650
MID-YEAR REPORT - AMENDMENT	-	-	1JAN95 -30JUN95	2	95FEC/011/1822
MID-YEAR REPORT - AMENDMENT	1,068,271	930,905	1JAN95 -30JUN95	4	96FEC/035/5295
MID-YEAR REPORT - AMENDMENT	1,068,271	930,905	1JAN95 -30JUN95	615	96FEC/039/0293
MID-YEAR REPORT - AMENDMENT	1,068,271	930,905	1JAN95 -30JUN95	11	96FEC/055/5248
REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	5	95FEC/003/5546
REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	2	95FEC/010/3061
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN95 -30JUN95	3	96FEC/033/2202
YEAR-END	1,121,722	1,217,111	1JUL95 -31DEC95	678	96FEC/023/4789
YEAR-END - AMENDMENT	1,122,594	1,217,111	1JUL95 -31DEC95	5	96FEC/037/1289
YEAR-END - AMENDMENT	1,122,594	1,217,111	1JUL95 -31DEC95	53	96FEC/044/1252
REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	7	96FEC/033/5364
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	2	96FEC/030/0333
1996 FILING FREQUENCY CHANGE NOTICE			31JAN96	1	96FEC/023/4788
ACKNOWLEDGEMENT OF FILING FREQUENCY CHANGE			19APR96	2	96FEC/046/2926
STATEMENT OF ORGANIZATION - AMENDMENT			11JUL96	2	96FEC/061/3066
STATEMENT OF ORGANIZATION - AMENDMENT			13AUG96	2	96FEC/072/2703
STATEMENT OF ORGANIZATION - AMENDMENT			10OCT96	2	96FEC/084/2597
MISCELLANEOUS REPORT TO FEC			13OCT96	2	96FEC/087/0627
FEBRUARY MONTHLY	201,521	46,651	1JAN96 -31JAN96	16	96FEC/032/3003
FEBRUARY MONTHLY - AMENDMENT	201,521	46,651	1JAN96 -31JAN96	8	96FEC/037/2843
FEBRUARY MONTHLY - AMENDMENT	201,521	46,651	1JAN96 -31JAN96	4	96FEC/048/4402
REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31JAN96	2	96FEC/039/1440
MARCH MONTHLY	175,158	206,047	1FEB96 -29FEB96	33	96FEC/035/3036
MARCH MONTHLY - AMENDMENT	175,158	206,047	1FEB96 -29FEB96	3	96FEC/048/4406
APRIL MONTHLY	167,320	244,542	1MAR96 -31MAR96	162	96FEC/045/1285
APRIL MONTHLY - AMENDMENT	166,920	244,542	1MAR96 -31MAR96	4	96FEC/055/5259
REQUEST FOR ADDITIONAL INFORMATION			1MAR96 -31MAR96	2	96FEC/054/2213

FEDERAL ELECTION COMMISSION
1995-1996
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 30OCT97
ATTACHMENT 1
PAGE 2 (Page 2 of 4)

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
	MAY MONTHLY	177,813	63,915	1APR96 -30APR96	179	96FEC/052/4984
	MAY MONTHLY - AMENDMENT	177,813	63,915	1APR96 -30APR96	3	96FEC/057/3859
	MAY MONTHLY - AMENDMENT	-	-	1APR96 -30APR96	2	96FEC/064/3927
	REQUEST FOR ADDITIONAL INFORMATION			1APR96 -30APR96	3	96FEC/059/4929
	JUNE MONTHLY	167,588	324,534	1MAY96 -31MAY96	243	96FEC/057/5288
	JUNE MONTHLY - AMENDMENT	167,588	324,534	1MAY96 -31MAY96	6	96FEC/072/2687
	JUNE MONTHLY - AMENDMENT	167,588	324,534	1MAY96 -31MAY96	4	97FEC/236/0873
	REQUEST FOR ADDITIONAL INFORMATION			1MAY96 -31MAY96	2	96FEC/070/4028
	JULY MONTHLY	180,370	289,275	1JUN96 -30JUN96	276	96FEC/069/0841
	JULY MONTHLY - AMENDMENT	180,370	281,775	1JUN96 -30JUN96	20	97FEC/205/4931
	REQUEST FOR ADDITIONAL INFORMATION			1JUN96 -30JUN96	7	97FEC/199/0389
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUN96 -30JUN96	7	97FEC/203/0066
	AUGUST MONTHLY	193,913	63,627	1JUL96 -31JUL96	388	96FEC/074/0093
	AUGUST MONTHLY - AMENDMENT	193,913	63,627	1JUL96 -31JUL96	15	96FEC/076/1532
	AUGUST MONTHLY - AMENDMENT	193,913	63,627	1JUL96 -31JUL96	4	97FEC/236/0877
	SEPTEMBER MONTHLY	183,931	196,582	1AUG96 -31AUG96	333	96FEC/082/0012
	SEPTEMBER MONTHLY - AMENDMENT	183,931	196,582	1AUG96 -31AUG96	20	96FEC/082/1620
	SEPTEMBER MONTHLY - AMENDMENT	183,931	196,582	1AUG96 -31AUG96	5	97FEC/205/4951
	SEPTEMBER MONTHLY - AMENDMENT	183,931	196,582	1AUG96 -31AUG96	3	97FEC/236/0881
	OCTOBER MONTHLY	665,961	526,262	1SEP96 -30SEP96	463	96FEC/105/1619
	OCTOBER MONTHLY - AMENDMENT	665,961	526,262	1SEP96 -30SEP96	42	96FEC/112/4463
	OCTOBER MONTHLY - AMENDMENT	665,961	526,262	1SEP96 -30SEP96	24	97FEC/205/4956
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP96 -30SEP96	2	97FEC/206/4013
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP96 -30SEP96	9	97FEC/211/1210
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP96 -30SEP96	2	97FEC/212/2784
	OCTOBER MONTHLY - AMENDMENT	665,961	526,262	1SEP96 -30SEP96	3	97FEC/236/0884
	REQUEST FOR ADDITIONAL INFORMATION			1SEP96 -30SEP96	3	97FEC/199/0386
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP96 -30SEP96	3	97FEC/203/0073
	REQUEST FOR ADDITIONAL INFORMATION			1SEP96 -30SEP96	5	97FEC/204/2095
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1SEP96 -30SEP96	6	97FEC/208/1721
	PRE-GENERAL	503,561	494,510	1OCT96 -16OCT96	21	96FEC/118/4094
	PRE-GENERAL - AMENDMENT	690,307	492,512	1OCT96 -16OCT96	472	96FEC/129/2704
	PRE-GENERAL - AMENDMENT	690,307	487,512	1OCT96 -16OCT96	23	97FEC/205/4908
	PRE-GENERAL - AMENDMENT	-	-	1OCT96 -16OCT96	1	97FEC/207/0247
	PRE-GENERAL - AMENDMENT	-	-	1OCT96 -16OCT96	1	97FEC/211/1437
	PRE-GENERAL - AMENDMENT	-	-	1OCT96 -16OCT96	2	97FEC/212/2782
	PRE-GENERAL - AMENDMENT	690,307	487,512	1OCT96 -16OCT96	3	97FEC/236/0887
	REQUEST FOR ADDITIONAL INFORMATION			1OCT96 -16OCT96	3	97FEC/199/0383
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT96 -16OCT96	3	97FEC/203/0076
	REQUEST FOR ADDITIONAL INFORMATION			1OCT96 -16OCT96	7	97FEC/204/2900
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT96 -16OCT96	5	97FEC/208/1727
	POST-GENERAL	205,157	449,572	17OCT96 -25NOV96	532	96FEC/157/1844

FEDERAL ELECTION COMMISSION
1995-1996
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 30OCT97
ATTACHMENT 1
PAGE 3 (Page 3 of 4)

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
	POST-GENERAL - AMENDMENT	205,157	449,572	17OCT96 -25NOV96	27	96FEC/157/0009
	POST-GENERAL - AMENDMENT	205,157	449,572	17OCT96 -25NOV96	5	97FEC/206/0424
	POST-GENERAL - AMENDMENT	205,157	449,572	17OCT96 -25NOV96	3	97FEC/236/0890
	REQUEST FOR ADDITIONAL INFORMATION			17OCT96 -25NOV96	10	97FEC/199/0373
	REQUEST FOR ADDITIONAL INFORMATION 2ND			17OCT96 -25NOV96	11	97FEC/203/0079
	YEAR-END	180,914	33,250	26NOV96 -31DEC96	543	97FEC/171/0936
	YEAR-END - AMENDMENT	183,414	33,250	26NOV96 -31DEC96	8	97FEC/206/0429
	YEAR-END - AMENDMENT	183,414	33,250	26NOV96 -31DEC96	3	97FEC/236/0893
	1 ST LETTER INFORMATIONAL NOTICE			26NOV96 -31DEC96	5	97FEC/199/1267
	TOTAL	5,382,918	0 5,072,285		5726	TOTAL PAGES

All reports have been reviewed.

FEDERAL ELECTION COMMISSION
1997-1998
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 30OCT97
ATTACHMENT 1
PAGE 1 (Page 4 of 4)

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
ASSOCIATION OF TRIAL LAWYERS OF AMERICA POLITICAL ACTION COMMITTEE				ID #C00024521 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: LAWYERS OF AMERICA; ASS'N OF TRIAL						
	1997 STATEMENT OF ORGANIZATION - AMENDMENT			21AUG97	3	97FEC/236/0870
	STATEMENT OF ORGANIZATION - AMENDMENT			5SEP97	3	97FEC/238/0459
	STATEMENT OF ORGANIZATION - AMENDMENT			19SEP97	4	97FEC/240/3261
	FEBRUARY MONTHLY	180,918	30,004	1JAN97 -31JAN97	21	97FEC/187/1056
	FEBRUARY MONTHLY - AMENDMENT	180,918	30,087	1JAN97 -31JAN97	22	97FEC/188/0444
	FEBRUARY MONTHLY - AMENDMENT	180,918	30,087	1JAN97 -31JAN97	4	97FEC/191/2639
	FEBRUARY MONTHLY - AMENDMENT	180,968	30,087	1JAN97 -31JAN97	38	97FEC/200/1264
	FEBRUARY MONTHLY - AMENDMENT	180,968	30,087	1JAN97 -31JAN97	4	97FEC/245/1032
	REQUEST FOR ADDITIONAL INFORMATION			1JAN97 -31JAN97	2	97FEC/244/2161
	MARCH MONTHLY	206,581	629,453	1FEB97 -28FEB97	41	97FEC/191/2643
	MARCH MONTHLY - AMENDMENT	206,548	629,253	1FEB97 -28FEB97	58	97FEC/200/1302
	MARCH MONTHLY - AMENDMENT	206,548	629,253	1FEB97 -28FEB97	4	97FEC/246/2974
	APRIL MONTHLY	0	220,247	1MAR97 -31MAR97	21	97FEC/197/2025
	APRIL MONTHLY - AMENDMENT	365,896	220,247	1MAR97 -31MAR97	243	97FEC/200/2406
	MAY MONTHLY	547,817	825,517	1APR97 -30APR97	267	97FEC/204/0427
	MAY MONTHLY - AMENDMENT	547,817	825,517	1APR97 -30APR97	29	97FEC/206/0019
	JUNE MONTHLY	191,432	184,889	1MAY97 -31MAY97	332	97FEC/208/0557
	JUNE MONTHLY - AMENDMENT	191,432	184,889	1MAY97 -31MAY97	14	97FEC/209/0808
	JULY MONTHLY	180,980	194,183	1JUN97 -30JUN97	364	97FEC/210/2528
	JULY MONTHLY - AMENDMENT	180,980	194,183	1JUN97 -30JUN97	22	97FEC/233/2767
	AUGUST MONTHLY	174,100	158,681	1JUL97 -31JUL97	386	97FEC/235/1981
	SEPTEMBER MONTHLY	198,496	16,225	1AUG97 -31AUG97	419	97FEC/241/3569
TOTAL		2,046,237	0 2,259,082 0	2301 TOTAL PAGES		

All reports have been reviewed.
Ending cash-on-hand as of 8/31/97: \$416,044
Outstanding debts owed to/by the committee
as of 8/31/97: \$0

SCHEDULE B

ITEMIZED DISBURSEMENTS

 If a separate schedule(s)
for each category of the
Detailed Summary Page

 PAGE OF
10 11
FOR LINE NUMBER
23

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Association of Trial Lawyers of America Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution: Charles E. Schumer (NY-9-D)	Date (month, day, year)	Amount of Each Disbursement this Period
Friends of Schumer 432 Park Ave South, Ste. 1206 PRIMARY 1996 New York, NY 10016	Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/9/96	\$2,000.00
Full Name, Mailing Address and ZIP Code Soglin for Congress P.O. Box 1643 GENERAL 1996 Madison, WI 53701-1643	Purpose of Disbursement Contribution: Paul Soglin (WI-2-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/5/96	\$5,000.00
Full Name, Mailing Address and ZIP Code Stewart for Congress P.O. Box 830 GENERAL 1996 Winchester, TN 37398	Purpose of Disbursement Contribution: Mark Stewart (TN-4-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/5/96	\$2,500.00
Full Name, Mailing Address and ZIP Code Friends of Tom Strickland P.O. Box 300279 GENERAL 1996 Denver, CO 80203-0279	Purpose of Disbursement Contribution: Tom Strickland (CO-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/27/96	\$5,000.00
Full Name, Mailing Address and ZIP Code Texas State Democratic Party 815 Brazos, Suite 200 FEDERAL ACCOUNT Austin, TX 78701	Purpose of Disbursement Contribution to non-federal candidate for Democratic Pty Texas State (TX-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	9/30/96	\$5,000.00 252
Full Name, Mailing Address and ZIP Code Sally Thompson for U.S. Senate 6220 SW 29th GENERAL 1996 Topeka, KS 66614	Purpose of Disbursement Contribution: Sally Thompson (KS-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/5/96	\$2,500.00
Full Name, Mailing Address and ZIP Code Committee to Elect Nydia Velazquez to Congress 1411 Avenue V, #2C PRIMARY 1996 Brooklyn, NY 11229	Purpose of Disbursement Contribution: Nydia M. Velazquez (NY-12-D) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/9/96	\$2,500.00
Full Name, Mailing Address and ZIP Code Ward For Congress 1905 Deer Park Ave. GENERAL 1996 Louisville, KY 40205	Purpose of Disbursement Contribution: Mike Ward (KY-3-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/9/96	\$2,500.00
Full Name, Mailing Address and ZIP Code Bob Weinberg for Congress P.O. Box 510 GENERAL 1996 Sperryville, VA 22740	Purpose of Disbursement Contribution: Bob Weinberg (VA-10-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	9/24/96	\$1,000.00
SUBTOTAL of Disbursements This Page (optional)			\$28,000.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

See separate schedule(s)
for each category of the
Detailed Summary PagePAGE 8 OF 11
FOR LINE NUMBER 23

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the names and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Association of Trial Lawyers of America Political Action Committee

Full Name, Mailing Address and ZIP Code Navarro for Congress 3610 38th St. NW, #F270 GENERAL 1996 Washington, DC 20016	Purpose of Disbursement Contribution: Peter Navarro (CA-49-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/26/96	Amount of Each Disbursement this Period \$5,000.00
Full Name, Mailing Address and ZIP Code Congressman Major Owens Re-election Committee G.P.O. Box 2265 PRIMARY 1996 Brooklyn, NY 11202	Purpose of Disbursement Contribution: Major R. Owens (NY-11-D) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/9/96	Amount of Each Disbursement this Period \$2,500.00
Full Name, Mailing Address and ZIP Code Steve Owens for Congress P.O. Box 8129 PRIMARY 1996 Scottsdale, AZ 85252	Purpose of Disbursement Contribution: Steve Owens (AZ-6-D) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/9/96	Amount of Each Disbursement this Period \$3,000.00
Full Name, Mailing Address and ZIP Code Steve Owens for Congress P.O. Box 8129 GENERAL 1996 Scottsdale, AZ 85252	Purpose of Disbursement Contribution: Steve Owens (AZ-6-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/9/96	Amount of Each Disbursement this Period \$5,000.00
Full Name, Mailing Address and ZIP Code Pallone for Congress P.O. Box 3176 GENERAL 1996 Long Branch, NJ 07740	Purpose of Disbursement Contribution: Frank Pallone, Jr. (NJ-6-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/11/96	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code Pallone for Congress P.O. Box 3176 GENERAL 1996 Long Branch, NJ 07740	Purpose of Disbursement Contribution: Frank Pallone, Jr. (NJ-6-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/24/96	Amount of Each Disbursement this Period \$500.00
Full Name, Mailing Address and ZIP Code Tarrant County Dem. Party 719 N. Beach Street FEDERAL ACCOUNT Ft. Worth, TX 76111	Purpose of Disbursement Contribution: Tarrant County Democratic Party (TX-O) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 9/30/96	Amount of Each Disbursement this Period \$5,000.00 EJR
Full Name, Mailing Address and ZIP Code Pastor for Arizona P.O. Box 2884 GENERAL 1996 Washington, 20013	Purpose of Disbursement Contribution: Ed Pastor (AZ-2-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/27/96	Amount of Each Disbursement this Period \$4,000.00
Full Name, Mailing Address and ZIP Code Donald Payne for Congress 850 Frelinghuysen Avenue GENERAL 1996 Newark, NJ 07114	Purpose of Disbursement Contribution: Donald M. Payne (NJ-10-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 9/24/96	Amount of Each Disbursement this Period \$500.00
SUBTOTAL of Disbursements This Page (optional)			\$26,500.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 6 OF 10
FOR LINE NUMBER 23

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Association of Trial Lawyers of America Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution: KY STATE DEM. PARTY (KY-O)	Date (month, day, year)	Amount of Each Disbursement this Period
Kentucky State Democratic Party P.O. Box 694 FEDERAL ACCOUNT Frankfort, KY 40602	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	10/8/96	\$5,000.00
Full Name, Mailing Address and ZIP Code Bexar County Democratic Party 517 N. Flores Street FEDERAL ACCOUNT San Antonio, TX 78205	Purpose of Disbursement Contribution: Bexar County Democratic Party (TX-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/1/96	Amount of Each Disbursement this Period \$5,000.00 EJR
Full Name, Mailing Address and ZIP Code Connecticut State Democratic Party FEDERAL ACCOUNT	Purpose of Disbursement Contribution: Connecticut State Democratic Party (CT-??-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/8/96	Amount of Each Disbursement this Period \$5,000.00
Full Name, Mailing Address and ZIP Code Dallas County Democratic Party 6440 N Central Expressway, #416, LB18 FEDERAL ACCOUNT Dallas, TX 75206	Purpose of Disbursement Contribution: Dallas County Democratic Party (TX-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/1/96	Amount of Each Disbursement this Period \$5,000.00 EJR
Full Name, Mailing Address and ZIP Code Galveston County Democratic Party 912 Oak Vista Court FEDERAL ACCOUNT Friendswood, TX 77548	Purpose of Disbursement Contribution: Galveston County Democratic Party (TX-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/1/96	Amount of Each Disbursement this Period \$5,000.00 EJR
Full Name, Mailing Address and ZIP Code Harris County Democratic Party 811 Westheimer FEDERAL ACCOUNT Houston, TX 77006	Purpose of Disbursement Contribution: Harris County Democratic Party (TX-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/1/96	Amount of Each Disbursement this Period \$5,000.00 EJR
Full Name, Mailing Address and ZIP Code Jefferson County Democratic Party 1855 Calder FEDERAL ACCOUNT Beaumont, TX 77701	Purpose of Disbursement Contribution: Jefferson County Democratic Party (TX-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/1/96	Amount of Each Disbursement this Period \$5,000.00 EJR
Full Name, Mailing Address and ZIP Code Kansas State Democratic Party FEDERAL ACCOUNT	Purpose of Disbursement Contribution: Kansas State Democratic Party (KS-??-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/11/96	Amount of Each Disbursement this Period \$5,000.00
Full Name, Mailing Address and ZIP Code Win in '96 1101 S.W. Washington Street FEDERAL ACCOUNT Portland, OR 97205	Purpose of Disbursement Contribution to non-federal candidate for Oregon Democratic Party (OR-D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/11/96	Amount of Each Disbursement this Period \$5,000.00
SUBTOTAL of Disbursements This Page (optional)			\$45,000.00
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	7	10
FOR LINE NUMBER 23		

Contributions to Federal Candidates/Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Association of Trial Lawyers of America Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution: Travis County Democratic Party (TX-D)	Date (month, day, year)	Amount of Each Disbursement this Period
Travis County Democratic Party 505 West Lynn FEDERAL ACCOUNT Austin, TX 78703	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	10/1/96	\$5,000.00 SPR
Full Name, Mailing Address and ZIP Code Paxon for Congress GENERAL 1996	Purpose of Disbursement Contribution: Bill Paxon (NY-27- R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/15/96	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code Earl Pomeroy for Congress P.O. Box 746 GENERAL 1996 Bismarck, ND 58502	Purpose of Disbursement Contribution: Earl Pomeroy (ND- 1-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/10/96	Amount of Each Disbursement this Period \$300.00
Full Name, Mailing Address and ZIP Code Ken Poston for Congress 106 Nance Lane PRIMARY DEBT 1996 Ringgold, GA 30736	Purpose of Disbursement Contribution: Ken Poston (GA-9- D) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/7/96	Amount of Each Disbursement this Period \$1,500.00
Full Name, Mailing Address and ZIP Code Ken Poston for Congress 106 Nance Lane GENERAL 1996 Ringgold, GA 30736	Purpose of Disbursement Contribution: Ken Poston (GA-9- D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/7/96	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code Quinn for Congress GENERAL 1996	Purpose of Disbursement Contribution: Jack Quinn (NY- 30-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/15/96	Amount of Each Disbursement this Period \$500.00
Full Name, Mailing Address and ZIP Code Ramstad For Congress PO Box 41986 GENERAL 1996 Plymouth, MN 55441	Purpose of Disbursement Contribution: Jim Ramstad (MN- 3-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/15/96	Amount of Each Disbursement this Period \$300.00
Full Name, Mailing Address and ZIP Code Rangel for Congress Committee 2030 Allen Place, N.W. GENERAL 1996 Washington, DC 20009	Purpose of Disbursement Contribution: Charles B. Rangel (NY-15-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1996	Date (month, day, year) 10/7/96	Amount of Each Disbursement this Period \$2,500.00
Full Name, Mailing Address and ZIP Code Rhode Island State Democratic Party 1991 Smith Street FEDERAL ACCOUNT North Providence, RI 02911	Purpose of Disbursement Contribution: Rhode Island (RI- D) Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other: Other 1996	Date (month, day, year) 10/15/96	Amount of Each Disbursement this Period \$5,000.00
SUBTOTAL of Disbursements This Page (optional)			\$17,500.00
TOTAL This Period (last page this line number only)			



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 21 1997

Carmen Belefonte, Treasurer
Association of Trial Lawyers of America
Political Action Committee
1050 31st Street, NW
Washington, DC 20007

Identification Number: C00024521

Reference: October Monthly Report (9/1/96-9/30/96)

Dear Ms. Belefonte:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

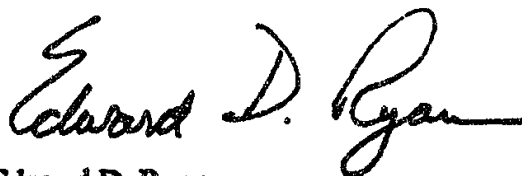
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

209

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 21 1997

Carmen Belefonte, Treasurer
Association of Trial Lawyers of America
Political Action Committee
1050 31st Street, NW
Washington, DC 20007

Identification Number: C00024521

Reference: Amended 12 Day Pre-General (10/1/96-10/16/96) dated 11/25/96

Dear Ms. Belefonte:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000.

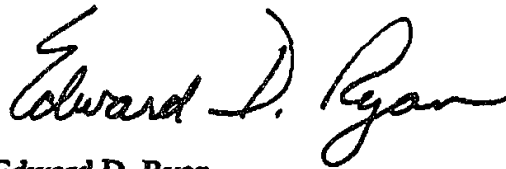
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA**

**POLITICAL
ACTION
COMMITTEE**



June 5, 1997

Mr. Edward Ryan
Senior Analyst
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Board of Trustees

Chairman

BARRY NACE, DC

CARMEN BELEFONTE, PA

JEFFREY BREIT, VA

CLAIR CARLIN, OH

ROXANNE BARTON CONLIN, IA

WALTER COSTELLO, MA

LAWRENCE ELOVICH, NY

JAMES ERISMAN, DE

JAN WOODWARD FOX, TX

ROBERT HARUSH, WI

RICHARD HAILEY, IN

RUSS HERMAN, LA

PAMELA ANAGNOS LIAPAKIS, NY

BRUCE MCMAITH, AR

MARK MANDELL, RI

JAMES MUNDY, PA

JOHN POWERS, NY

ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC



Treasurer

CARMEN BELEFONTE

PAC Coordinator

HEATHER WEAVER

Counsel

DANIEL COHEN

JUN 5 4 59 PM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS DIVISION
JUN 5 1997

Identification Number: C00024521

Reference: October Monthly Report (9/1/96-9/30/96)
Amended 12 Day Pre-General (10/1/96-10/16/96) dated 11/25/96

Dear Ed:

I write in response to your letters of May 21, 1997 in which you notified ATLA PAC that it appeared to exceed the limits of 2 U.S.C. §441a(a) by making contributions to a political committee and its affiliates in excess of \$5,000 for a calendar year. As shown in our FEC reports, ATLA PAC made \$5,000 contributions to the Texas State Democratic Party and the following other political committees in the state of Texas: the Tarrant County Democratic Party, the Bexar County Democratic Party, the Dallas County Democratic Party, the Gavelston County Democratic Party, the Harris County Democratic Party, and the Jefferson County Democratic Party.

We understand that under 11 C.F.R. §110.3(b) local party committees share the same contribution limits as their state party committee, unless they can demonstrate their independence. It was and continues to be our understanding that the Texas party committees listed above have demonstrated their independence from the Texas State Democratic Party and are therefore subject to separate contribution limits. Prior to its contributions to the state party committee and the local party committees, it was represented to ATLA PAC that these local committees were independently run, controlled, and financed. If the local party committees are in fact affiliated party committees, please inform us immediately and we will promptly take any and all necessary remedial action.

Please do not hesitate to contact me to discuss this matter. As always, thank you for your patience and assistance.

Sincerely,

Heather

Heather Weaver
Coordinator, ATLA PAC



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

June 12, 1997

Carmen Belefonte, Treasurer
Association of Trial Lawyers of America
Political Action Committee
1050 31st Street, NW
Washington, DC 20007

Identification Number: C00024521

Reference: October Quarterly (9/1/96-9/30/96) and Amended 12 Day Pre-General
(10/1/96-10/16/96 dated 11/25/96) Reports

Dear Ms. Belefonte:

On May 21, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your June 5, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

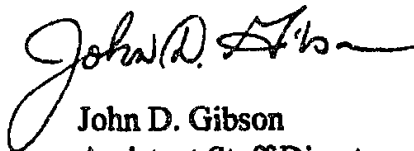
-Schedule B of your report discloses contributions which appear to exceed the limits set forth in the Act (copies attached). Your response states that the following local party committees are independently run, controlled and financed, and are, therefore, separate from the Texas State Democratic Party: Tarrant County Democratic Party, Bexar County Democratic Party, Dallas County Democratic Party, Galveston County Democratic Party, Harris County Democratic Party, Jefferson County Democratic Party and Travis County Democratic Party. You therefore feel it was proper to make a \$5000 contribution to each. Please note that local party committees within a state are presumed to be affiliated with the state party committee and therefore considered affiliated with each other, thus sharing the contribution limit for one political committee. A local party committee may be considered independent of the state party committee if it can meet certain standards. See 11 CFR 110.3(b)(3)(i) and (ii). If these local party committees feel they are not affiliated, they should submit an Advisory

Opinion Request to the Commission. To correct the excessive contributions made by your committee, you should notify the recipient committee(s) and request a refund of the amount(s) in excess of \$5000.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Edward Ryan on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,



**John D. Gibson
Assistant Staff Director
Reports Analysis Division**

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA**

**POLITICAL
ACTION
COMMITTEE**

◇

Board of Trustees

Chairman

BARRY NACE, DC

CARMEN BELEFONTE, PA

JEFFREY BREIT, VA

CLAIR CARLIN, OH

ROXANNE RARTON CONLIN, IA

WALTER COSTELLO, MA

LAWRENCE ELOVICH, NY

JAMES ERISMAN, DE

JAN WOODWARD FOX, TX

ROBERT HABUSH, WI

RICHARD HAILEY, IN

RUSS HERMAN, LA

PAMELA ANAGNOS LIAPAKIS, NY

BRUCE McMATH, AR

MARK MANDELL, RI

JAMES MUNDY, PA

JOHN POWERS, NY

ROBERT STEINBERG, CA

LARRY STEWART, FL

HOWARD TWIGGS, NC

◇

Treasurer

CARMEN BELEFONTE

PAC Coordinator

HEATHER WEAVER

Counsel

DANIEL COHEN

Mr. Edward Ryan, Senior Analyst
Federal Election Commission
999 "E" Street, NW
Washington, D.C. 20463

Identification Number: C00024521

Reference:

October Quarterly (9/1/96-9/30/96) and Amended 12 Day Pre-General
(10/1/96-10/16/96 dated 11/25/96) Reports

Dear Ed:

I write to respond to correspondence I received from John D. Gibson of your office, dated June 12, 1997 concerning contributions ATLA PAC made to the Texas State Democratic Party and the following local county parties:
(1) Tarrant County Democratic Party; (2) Bexar County Democratic Party; (3) Dallas County Democratic Party; (4) Galveston County Democratic Party; (5) Harris County Democratic Party; (6) Jefferson County Democratic Party; and (7) Travis County Democratic Party.

As I wrote to you previously, prior to making the contributions in question, ATLA PAC believed in good faith that the local Texas party committees listed above had demonstrated their independence from the Texas State Democratic Party and were therefore subject to separate contributions limits. I also noted that ATLA PAC was willing to take any and all necessary remedial action if the FEC determined that the local party committees were in fact affiliated with the state party committee or each other. The letter from Mr. Gibson indicates that local party committees are presumed to be affiliated with their state party counterparts and suggests that the local party committees submit an Advisory Opinion Request to the Commission to establish their independence. It concludes by advising ATLA PAC to correct its alleged excessive contributions by requesting refunds from the recipient local party committees.

Upon receipt of Mr. Gibson's letter, ATLA PAC acted promptly to take the appropriate remedial action indicated. Once ATLA PAC receives refunds from the recipient local party committees, we will submit amendments for the October Quarterly report and the amended 12 Day Pre-General Report reflecting these refunds. I have attached copies of letters ATLA PAC sent to the local party committee recipients requesting refunds of ATLA PAC's contributions. I hope that these corrective actions resolve this matter.

As always, I appreciate your assistance and cooperation. Please do not hesitate to contact me with additional questions or concerns.

Sincerely,

Heather

Heather Weaver

Coordinator, ATLA PAC

Attachments

HAND DELIVERED

June 23, 1997

JUN 24 11 32 AM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA**

**POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NACE, DC
CARMEN BELEFONTE, PA
JEFFREY BRETT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, IA
WALTER COSTELLO, MA
LAWRENCE ELAVICH, NY
JAMES ERISMAN, DE

IAN WOODWARD FOR, TX
ROBERT HARUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIAPAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, RI
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC

Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Gilbert Adams, Treasurer
Jefferson County Democratic Party
1855 Calder
Beaumont, TX 77701

Dear Mr. Adams:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Jefferson County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver
Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
JUN 24 11 32 AM '97

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA
POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NACE, DC
CARMEN BELEFONTE, PA
JEFFREY BRETT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, LA
WALTER COSTELLO, MA
LAWRENCE ELOVICH, NY
JAMES ERISMAN, DE

JAN WOODWARD FOX, TX
ROBERT HABUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIARAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, RI
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC
♦
Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Myrtle Ross, Treasurer
Harris County Democratic Party
811 Westheimer
Houston, TX 77006

Dear Ms. Ross:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Harris County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver

Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
JUN 24 1997
11 32 AM

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA
POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NACE, DC
CARMEN BELEFONTE, PA
JEFFREY BRETT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, LA
WALTER COSTELLO, MA
LAWRENCE ELOVICH, NY
JAMES ERISMAN, DE

JAN WOODWARD FOX, TX
ROBERT HARUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIAPAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, RI
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC
♦
Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Mary Ellen Brennan, Treasurer
Galveston County Democratic Party
912 Oak Vista Court
Friendswood, TX 77548

Dear Ms. Brennan:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Galveston County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver
Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
JUN 24 11 32 AM '97

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA**

**POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NACE, DC
CARMEN BELEFONTE, PA
JEFFREY BREIT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, IA
WALTER COSTELLO, MA
LAWRENCE ELOVICH, NY
JAMES ERISMAN, DE

JAN WOODWARD FOX, TX
ROBERT HABUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIAPAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, RI
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC
♦
Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Art Render, Treasurer
Tarrant County Democratic Party
719 North Beach Street
Fort Worth, TX 76111

Dear Mr. Render:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on September 30, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Tarrant County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver
Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

JUN 24 11 32 AM '97

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA
POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NADE, DC
CARMEN BELEFONTE, PA
JEFFREY BRETT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, LA
WALTER COSTELLO, MA
LAWRENCE ELOVICH, NY
JAMES ERISMAN, DE

IAN WOODWARD FOX, TX
ROBERT HABUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIAPAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, NJ
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC

Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Lisa Payne, County Chair
Dallas County Democratic Party
6440 N. Central Expressway, #416, LB18
Dallas, TX 75206

Dear Ms. Payne:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Dallas County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver
Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
JUN 24 11 32 AM '97

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA**

**POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NACE, DC
CARMEN BELEFONTE, PA
JEFFREY BREIT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, LA
WALTER COSTELLO, MA
LAWRENCE ELOVICH, NY
JAMES ERISMAN, DE

JAN WOODWARD FORD, TX
ROBERT HARUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIAPAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, RI
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC

Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Bexar County Democratic Party
517 N. Flores Street
San Antonio, TX 78205

ATTENTION: Treasurer

Dear Sir / Madam:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Bexar County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver
Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
JUN 24 11 32 AM '97

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA**

**POLITICAL
ACTION
COMMITTEE**

Board of Trustees
Chairman
BARRY NACE, DC

CARMEN BELEFONTE, PA
JEFFREY BREIT, VA
CLAIR CARLIN, OH
ROXANNE BARTON CONLIN, IA
WALTER COSTELLO, MA
LAWRENCE ELOVICH, NY
JAMES ERISMAN, DE

JAN WOODWARD FOX, TX
ROBERT HABUSH, WI
RICHARD HAILEY, IN
RUSS HERMAN, LA
PAMELA ANAGNOS LIAPAKIS, NY
BRUCE McMATH, AR
MARK MANDELL, RI
JAMES MUNDY, PA
JOHN POWERS, NY
ROBERT STEINBERG, CA

LARRY STEWART, FL
HOWARD TWIGGS, NC

Treasurer
CARMEN BELEFONTE
PAC Coordinator
HEATHER WEAVER
Counsel
DANIEL COHEN

June 18, 1997

Travis County Democratic Party
505 West Lynn
Austin, TX 78703

ATTENTION: Treasurer

Dear Sir / Madam:

On behalf of the Association of Trial Lawyers of America ("ATLA PAC"), I write to request a refund of ATLA PAC's \$5,000 contribution made on October 1, 1996.

In correspondence to ATLA PAC, the Federal Election Commission ("FEC" or "Commission") questioned whether the Travis County Democratic Party committee is affiliated with the Texas State Democratic Party. ATLA PAC responded that it in good faith believed that your committee was an independent committee, unaffiliated with the state party or any other county party. The FEC answered that there is a presumption that local party committees are affiliated with their state party counterparts and recommended that your committee submit an Advisory Opinion Request to the Commission to establish its independence. Accordingly, the FEC informed ATLA PAC that its contributions to your committee and the state party were presumed to be excessive contributions and instructed ATLA PAC to seek refunds.

At the time ATLA PAC made its contributions, it received, and had no reason to question, assurances that your committee was independent from the state party committee. However, due to the FEC's inquiry, ATLA PAC believes that its only prudent course of action at this time is to request a refund.

We appreciate your cooperation and we hope to resolve this matter as expeditiously as possible. Please do not hesitate to contact our counsel, Roger Ballentine, at 202-457-5666 with any questions.

Sincerely,

Heather Weaver
Heather Weaver
Coordinator, ATLA PAC

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
JUN 24 11 33 AM '97

TELECON

ANALYST: Edward D. Ryan

CONVERSATION WITH: Heather (Weaver) Tureen, Coordinator,
ATLA PAC

COMMITTEE: Association of Trial Lawyers of America Political
Action Committee - C00024521

DATE: July 1, 1997

SUBJECTS(S): Reporting refunds on the report covering the
period they are received.

I placed a telephone call to Ms. Heather (Weaver) Tureen, Coordinator of the Association of Trial Lawyers of America Political Action Committee ("the Committee"), after she had responded to an Inadequate Response (IR) Notice dated June 12, 1997. In that response, dated June 23, 1997, she had summarized the Committee's position concerning contributions made to the Texas State and Local County Democratic Party committees and stated that once they received the IR notice they took prompt "appropriate remedial action". That action consisted of sending letters to the local party committee recipients requesting refunds of the Committee's contributions. Ms. Tureen said that once they received the refunds they would submit amendments for the October Quarterly and 12 Day Pre-General Reports reflecting the refunds.

I advised Ms. Tureen, that when they receive the refunds from these committees they should include them on the report covering the period when they are received, not on amendments to the original reports. I told her not to go back in time to include this activity, but to go forward based on when they receive the refunds. She understood and said she would amend her response accordingly.

**ASSOCIATION
of TRIAL LAWYERS
of AMERICA
POLITICAL
ACTION
COMMITTEE**

Board of Trustees

Chairman

BARRY NACE, DC

CARMEN BELEFONTE, PA

JEFFREY BRETT, VA

CLAIR CARLIN, OH

ROXANNE BARTON CONLIN, LA

WALTER COSTELLO, MA

LAWRENCE ELOVICH, NY

JAMES ERISMAN, DE

JAN WOODWARD FOX, TX

ROBERT HABUSH, WI

RICHARD HAILEY, IN

RUSS HERMAN, LA

PAMELA ANAGNOS LIAPAKIS, NY

BRUCE MCMATH, AR

MARK MANDELL, RI

JAMES MUNDY, PA

JOHN POWERS, NY

ROBERT STEINBERG, CA

RECEIVED

FEDERAL ELECTION COMMISSION

U.S. DEPARTMENT OF JUSTICE

Treasurer

CARMEN BELEFONTE

PAC Coordinator

HEATHER WEAVER

Counsel

DANIEL COHEN

July 1, 1997

Mr. Edward Ryan, Senior Analyst
Reports Analysis Division
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Identification #: C00024521

Reference: Correspondence to the FEC dated 6/23/97

Dear Ed:

Per our conversation earlier today, I am amending my letter to you dated 6/23/97 regarding refunds of alleged excessive contributions made to the following Texas local county parties: (1) Tarrant County Democratic Party; (2) Bexar County Democratic Party; (3) Dallas County Democratic Party; (4) Galveston County Democratic Party; (5) Harris County Democratic Party; (6) Jefferson County Democratic Party; and (7) Travis County Democratic Party.

In the second to last paragraph of my June 23rd letter (*copy attached*), I mistakenly wrote that ATLA PAC will submit amendments for the October Quarterly report and the amended 12 Day Pre-General report reflecting refunds from the local county party recipients. Rather, ATLA PAC will disclose any refunds (from the local county party recipients mentioned above) on Schedule A supporting Line 16 of the report covering the period during which they are received. I hope that this clarifies ATLA PAC's intended course of corrective action in this matter.

As always, I appreciate your assistance and patience. Please do not hesitate to contact me with any additional questions or concerns.

Sincerely,

Heather Weaver

Heather (Weaver) Tureen
Coordinator, ATLA PAC

Attachment